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Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

Duro Dyne National Corp., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 18 –27963 (MBK)

(Jointly Administered)

**DEBTORS' SUPPLEMENT TO MOTION FOR ENTRY OF AN ADMINISTRATIVE FEE  
ORDER ESTABLISHING CERTAIN PROCEDURES FOR ALLOWANCE OF INTERIM  
COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS  
RETAINED BY ORDER OF THIS COURT**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), by and through their undersigned counsel, submit this request for supplemental relief (the “Supplemental Relief”) with respect to the motion for entry of an order establishing procedures for the allowance of interim compensation and reimbursement of expenses of professionals (the “Motion”)<sup>2</sup>, and in support thereof, the Debtors respectfully state as follows:

1. When these Chapter 11 Cases were filed, the Debtors anticipated confirming a plan before the end of the year in order to realize a tax writeoff for the amounts being contributed to

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are: Duro Dyne National Corp. (4664); Duro Dyne Machinery Corp. (9699); Duro Dyne Corporation (3616); Duro Dyne West Corp. (5943); and Duro Dyne Midwest Corp. (4662).

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

the Asbestos Trust in 2018. However, based on issues arising in the Chapter 11 Cases, the hearing on confirmation of the Debtors' Chapter 11 Plan is now scheduled for March \_\_\_, 2019, and the writeoff's for contributions made to the Asbestos Trust will not be realized until 2019. In an effort to reduce its tax liability in 2018, the Debtors would like to be in a position to pay as much of professional fees incurred in the Chapter 11 Cases before the end of 2018.

2. By this Supplement, the Debtors seek to modify the Motion to allow Professionals to file applications for fees and expenses incurred before November 30, 2018 on or before December 15, 2018 (the "First Application"). The Debtors request that all other procedures for compensating and reimbursing the Professionals remain the same as set forth in the Motion, including the 14-day objection period. If no objection is filed to a Professionals' First Application, the Debtors request that they be permitted to pay 80% of such professional fees and 100% of expenses on December 30, 2018 in accordance with the procedures set forth in the Motion.

3. No other changes to the relief sought in the Motion are requested herein.

### **CONCLUSION**

For the reasons set forth above, the Debtors respectfully request that the Court grant the Motion, including the Supplemental Relief sought herein, and enter an order establishing procedures for the allowance of interim compensation and reimbursement of expenses of Professionals.

Dated: November 30, 2018

**LOWENSTEIN SANDLER PC**

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